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December 31, 2024

FILED ON ECF VIA LETTER-MOTION

Honorable Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007

Re: *Parker v. Bursor, 24-cv-245 (JGLC) (RFT)*
Letter-Motion for Extension of Time to File Expert Report on Motion for
Sanctions Arising Out of Spoliation and Witness Tampering

Dear Magistrate Judge Tarnofsky:

This Firm, along with Judd Burstein, P.C., represents Defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, “Defendants”) in the above-referenced matter. We submit this letter pursuant to Rule I.E of Your Honor’s Individual Practices in Civil Cases to request an extension of time of one week, from January 6, 2025 to January 13, 2025, to file Defendants’ expert declaration and report in support of their forthcoming motion for sanctions arising out of Plaintiff’s spoliation of evidence and witness tampering (“Sanctions Motion”) due to an unexpected medical emergency of a family member of Defendants’ expert. Defendants are not seeking additional time to file the motion, including the memorandum of law in support, and will file same by the due date of January 6, 2025. Plaintiff’s counsel have indicated that they consent to this short extension request for Defendants’ expert report.

No adjustments to the briefing schedule on the Sanctions Motion are needed. All briefing on the motion will be completed well before the hearing on the motion on February 19, 2025, as the current briefing schedule calls for Defendants’ reply to be filed by January 28, 2025. *See* ECF No. 224.

For these reasons, Defendants respectfully request that the Court grant an extension of time from January 6, 2025 to January 13, 2025 to file their anticipated expert declaration and report. To the extent the Court deems it necessary to adjust any other deadlines in the briefing schedule, Defendants respectfully request that the Court keep the February 19, 2025 hearing date in place.

GIBBONS P.C.

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Christine A. Amalfe

Christine A. Amalfe

cc: All counsel of record (via ECF)